

March 18, 2019

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Applications of Securus Technologies, Inc. and Inmate Calling Solutions, LLC
d/b/a ICSolutions for Consent to the Transfer of Control of Licenses and
Authorizations – WC Docket No. 18-193; Implementation of the Pay
Telephone Reclassification and Compensation Provisions of the
Telecommunications Act of 1996 et al. – WC Docket No. 12-375**

Dear Ms. Dortch:

Securus Technologies, Inc. (“STI”) hereby responds to certain questions and/or requests for clarification from the Federal Communications Commission’s (“FCC” or “Commission”) Wireline Competition Bureau Staff concerning select information contained in the public version of STI’s annual inmate calling services report for calendar year 2017.¹ STI understands that the Commission Staff has reviewed some or all of the annual report in connection with its review of the transaction in WC Docket No. 18-193. The Commission Staff has requested that STI provide answers to the inquiries below.²

Question 1: *Review and confirm whether the prison Average Daily Populations (“ADP”) are appropriately redacted from the public filings.*

¹ See Letter from Stephanie A. Joyce, Arent Fox LLP to Marlene H. Dortch, FCC, WC Docket No. 12-375 (dated April 2, 2018).

² The Commission Staff has also requested that in providing the responses STI correct its 2017 Annual Report in WC Docket No. 12-375. Accordingly, this letter serves to correct STI’s 2017 Annual Report and is being filed in WC Docket No. 12-375 concurrently.

STI Response: STI did not redact prison ADP numbers from the public version of its 2017 Annual Report. As required by FCC Form 2301(a), Securus did not report ADP numbers for prisons.

II. ICS Rates

Facility Name	Facility Type	ADP (for jails)	Intrastate Rate	Intrastate Rates Different from Listed Rate

Question 2: *Roanoke City Jail – 51029 is listed as having an ADP of 52,321. Is this correct?*

STI Response: No, the correct ADP for Roanoke City Jail, VA should have been reported as 667.

Question 3: *13 facilities across various states in many cases listed as “labs” or “technology centers,” are listed as having an ADP of 20,032. Are these correct?*

STI Response: The following eight sites are internal test sites, and should not have been included in the 2017 Annual Report:

Kellway Test Lab Atlanta 1
Kellway Test Lab Cam1
Kellway Test Lab DCM1
Securus Technology Center 1
Securus Technology Center 2
Securus Technology Center 3
Securus Technology Center 4
Securus Technology Center 5

The other five sites have incorrect ADP. The correct ADP for these sites are:

Shawano County Jail, WI: 289
Shawano County Work Release, WI: 289
Floyd County Jail, IN: 305
Shelby County Jail, IL: 17
Ashtabula County Jail, OH: 151

Note: Shawano County Jail and Shawano County Work Release are covered under the same contract.

Question 4: *10 facilities across various states are listed as having an ADP of 19,118. Are these correct?*

STI Response: The following five sites are facilities within the New York City Department of Corrections. The ADP for these sites is the number included in our records for the New York City Department of Corrections.

New York City DOC – Otis Bantum Correctional Center
New York City DOC – Bellevue Hospital Prison Ward
New York City DOC
New York City DOC – Robert N Davoren Complex
New York City DOC – Rose M Singer Center

The other five sites have incorrect ADP. The correct ADP for these sites are:

Shawnee County Adult Detention Center, KS: 477
Gunnison County Jail, CO: 24
Shawnee County Juvenile Detention Center, KS: 477
Logan County Jail, CO: 114
De Baca County Detention Center, NM: 8

Note: Shawnee County Adult Detention Center and Shawnee County Juvenile Detention Center are covered under the same contract.

Question 5: *Hot Springs Detention Center – 00611 in WY is listed as having an ADP of 13,347. Is this correct?*

STI Response: No, the correct ADP for Hot Springs County Detention Center, WY should have been reported as 16.

Question 6: *Neshoba County Detention Center – 80254 in MS is listed as having an ADP of 11,974. Is this correct?*

STI Response: No, the correct ADP for Neshoba County Detention Center, MS should have been reported as 70.

Question 7: *Troup County Correctional Institute – 05393 is also listed as having an ADP of 11,974. Is this correct?*

STI Response: No, but this site should be removed from the report as the contract ended in 2015. The last ADP for Troup County Correctional Institute, GA we have in our records is 350.

Question 8: *In a range of cases, it appears the same ADP is used across all the facilities supplied under a single contract, or at least to a single purchaser. Is this an accurate reading of your filing?*

STI Response: That is accurate. STI tracks ADP for customers at a contract level. To the extent a customer has multiple facilities (e.g., state departments of correction and large county or municipal jails), STI does not maintain facility-level ADP data in the ordinary course.

For the facilities noted:

GA DOC – Tift College Non Custody should be removed from the report. This site ID is assigned as a test site for the Georgia Department of Corrections, and it is not used for inmate calling services.

GA DOC – Valdosta State Annex should be categorized as a prison.

All the Arizona Department of Correction sites should be removed as that was not an active customer in 2017.

Question 9: *The GA DOC is listed in two locations with an ADP that is a close approximation for ADP for the state. If you did not hold the state of GA's contract for the bulk of its facilities for some part of 2017, please correct the entry either dropping GA or adding the correct ADP for the facilities served.*

STI Response: STI had the Georgia Department of Corrections contract for all of 2017, but GA DOC – Tift College Non Custody and GA DOC – Valdosta State Annex appear to have been incorrectly categorized as Jails. The ADP for Georgia Department of Corrections in STI's records is 52,431. As discussed in the response to Item 1, the Annual Report does not require the reporting of ADP information for Prisons.

Note: In its 2017 Annual Report, STI reported all sites with associated rates in its databases. As a result, the report includes customers that contracted with STI starting in 2017 and also customers whose contracts expired in 2017 and ended their relationship with STI during the year.

Question 10: *Identify any contracts or facilities listed for which STI is not the primary contractor.*

STI Response: STI is not the primary contractor for the Texas Department of Criminal Justice and the Wisconsin Department of Corrections.

Question 11: *Advise us of any anomalies we missed.*

STI Response: Please note the following:

AR DOC – East Central Arkansas Community Correction Center: This facility is incorrectly categorized as a Jail and should be categorized as a Prison

Floyd County Detention Center, KY: The correct ADP for this site is 130.

Princeton Board Room, TX is an internal test site, and should not have been included in the 2017 Annual Report.

The following additional clarifying responses also relate to information contained in the public version of the 2017 Annual Report:

Daviess County Jail, IN and Madison County Sheriff's Department, IN are separate contracts and the ADP data show they both had an ADP of 260.

Fresno County Juvenile Justice Center, CA and Napa County Department of Corrections, CA are separate contracts and the ADP data show they both had an ADP of 250.

Richland County Jail, OH and Licking County Justice Center, OH are separate contracts and the ADP data show they both had an ADP of 223.

Upson County Jail, GA and Richmond County Correctional Institution, GA are separate contracts and the ADP data show they both had an ADP of 215.

Big Sandy Regional Detention Center, KY and Casey County Detention Center, KY are separate contracts and the ADP data show they both had an ADP of 200.

Many Rivers Juvenile Detention Center, MN is one of the facilities covered under the same contract with Olmsted County Adult Detention Center, MN.

North Central Ohio Rehabilitation, OH is one of the facilities covered under the same contract with Multi-County Correctional Center, OH.

Wayne County Detention Center, KY and Logan County Detention Center, KY are separate contracts and the ADP data show they both had an ADP of 180.

West Central Community Correctional, OH and Scioto County Correctional Center, OH are separate contracts and the ADP data show they both had an ADP of 175.

Van Zandt County Jail, TX and Wise County Sheriff's Department, TX are separate contracts and the ADP data show they both had an ADP of 170.

Columbia County Jail, WI and Jefferson County Sheriff's Office, WI are separate contracts and the ADP data show they both had an ADP of 160.

Grand Traverse County, MI and Chippewa County Jail, MI are separate contracts and the ADP data show they both had an ADP of 160.

Henderson County Detention Center, TN and Marion County Jail, TN are separate contracts and the ADP data show they both had an ADP of 150.

Rockingham County Jail, NC and Rutherford County Detention Center, NC are separate contracts and the ADP data show they both had an ADP of 150.

Dillon County Detention Center, SC and Oconee County Law Enforcement, SC are separate contracts and the ADP data show they both had an ADP of 150.

Montcalm Sheriff's Department, MI (covered under the same contract with Montcalm County District Court) and St. Joseph County Jail, MI are separate contracts and the ADP data show they both had an ADP of 134.

Scott County Detention Center, KY and Carroll County Detention Center, KY are separate contracts and the ADP data show they both had an ADP of 130.

Alamosa County Detention Center, CO and Teller County Jail, CO are separate contracts and the ADP data show they both had an ADP of 126.

Atascosa County Jail, TX and Wood County Sheriff Department, TX are separate contracts and the ADP data show they both had an ADP of 120.

Stephens County Jail, GA and Greene County Jail, GA are separate contracts and the ADP data show they both had an ADP of 120.

Adams County Jail, IL and Whiteside County Jail, IL are separate contracts and the ADP data show they both had an ADP of 109.

Cheatham County Jail, TN and Hardin County Sheriff's Department, TN are separate contracts and the ADP data show they both had an ADP of 106.

Cass County, MI and Ogemaw County Jail, MI are separate contracts and the ADP data show they both had an ADP of 105.

Monroe County Sheriff's Department, WI and Polk County Jail, WI are separate contracts and the ADP data show they both had an ADP of 103.

Ogle County Jail, IL and Boone County Jail, IL are separate contracts and the ADP data show they both had an ADP of 100.

Gibson County Jail, IN and Allen County Juvenile Justice Center, IN are separate contracts and the ADP data show they both had an ADP of 100.

Polk County Sheriff's Office, OR and Jefferson County Sheriff's Office, OR are separate contracts and the ADP data show they both had an ADP of 96.

Question 12: *Should Lee Adjustment Center (Do not use) – 08058 be included?*

STI Response: No.

Question 13: *Should "Atlanta "Customer Test Facility Site – 09020" and "Dallas Customer Test Facility Site – 09019" be included?*

STI Response: No, those are internal test sites, and should not have been included in the 2017 Annual Report

Question 14: *Both TX and WI DOC facilities are listed here. Confirm that in 2017 CenturyLink was the primary contractor for both.*

STI Response: Confirmed.

Question 15: *Identify any other contract or facilities listed for which STI is not the primary contractor.*

STI Response: Please see the response to Question 10 above.

Question 16: *Advise us of any anomalies we missed.*

STI Response: Please note the following:

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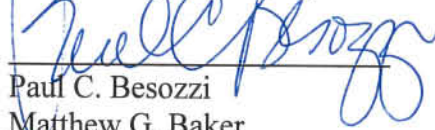
Michigan Department of Corrections is not an inmate calling services customer of STI and MI DOC – Parr Highway (EMBARQ) should not have been included in the 2017 Annual Report.

Except for the Eric M Taylor Center, all New York City Department of Corrections facilities should be listed as jails. The Eric M Taylor Center is the only facility in the New York City Department of Corrections that holds inmates for a year or less.

East Carroll Riverbed Detention Phase I, LA should be categorized as a Jail and not a Prison.

Please contact the undersigned should you have any questions concerning the foregoing.

Respectfully submitted,



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